

**THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

CORNEL WEST AND MELINA  
ABDULLAH, GERALDINE  
TUNSTALLE, KATHERINE HOPKINS-  
BOT, AND CHARLES HIER,

Plaintiffs,

v.

PENNSYLVANIA DEPARTMENT OF  
STATE AND AL SCHMIDT, IN HIS  
CAPACITY AS SECRETARY OF THE  
COMMONWEALTH,

Defendants.

No. 2:24-cv-01349

*(filed electronically)*

**AFFIDAVIT OF SAMANTHA G. ZIMMER IN SUPPORT OF MOTION FOR  
ADMISSION *PRO HAC VICE***

I, Samantha G. Zimmer, make this affidavit in support of my Motion For Admission Pro Hac Vice in the above-captioned matter as counsel *pro hac vice* for Plaintiffs in the above-captioned matter pursuant to LCvR 83.2 and LCvR 83.3 and this Court's Standing Order Regarding *Pro Hac Vice* Admissions dated May 31, 2006 (Misc. No. 06-151).

I, Samantha G. Zimmer, being duly sworn, do hereby depose and say as follows:

1. I am an Associate of the law firm Kleinbard LLC.
2. My business address is 1717 Arch Street, Three Logan Square, 5<sup>th</sup> Floor, Philadelphia, PA 19103.

3. I am a member in good standing of the Bar of the Commonwealth of Pennsylvania.

4. My Pennsylvania bar identification number is 325650.

5. A current certificate of good standing from the Supreme Court of Pennsylvania is attached to this Affidavit as Exhibit A.

6. There are no disciplinary proceedings pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

7. I attest that I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.

8. I attest that I have read, know, and understand the Local Rules of Court for the United States District Court for the Western District of Pennsylvania.

9. Based upon the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter.

I certify and attest that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Date: January 22, 2025

/s/ Samantha G. Zimmer